



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
FORBES FIELD, TOPEKA, KANSAS 66620



HAZARDOUS WASTE GENERATOR/TRANSPORTER
COMPLIANCE INSPECTION CHECKLIST

General

☒ Routine ☐ Complaint

EPA ID KSD 067 925 347 Time 1030 Date 020499
Facility Name BOEHRINGER INGELHEIM ANIMAL HEALTH District Northeast
Street 15TH + OAK City ELWOOD Kansas ZIP 66024
Mailing Address (if different than above) P.O. BOX 338
County DONIPHAN Phone (913) 365-9070
Contact(s) PAUL WATERS - ENV. QUALITY MGR.
Inspector(s) M. BETH ROWLANDS SIC: 2834
Type of Business ANIMAL HEALTH PRODUCT MFG. Number of Employees 200±
Facility size classification: ☐ Closed ☐ Small Qty. Generator ☒ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☐ Transporter
Other Regulated Activities: ☐ T/S/D Facility ☒ Used Oil Activities
(complete applicable checklist) ☐ HW Burner/Marketer ☐ Universal Waste Activities
Has the company declared any information/processes as trade secrets (KSA 65-3447)? NO
If yes, explain:

Industrial Wastes Generated

(List hazardous wastes first)

Waste:	CHLORINATED LAB SOLVENTS	NON-CHLORINATED LAB SOLVENTS
If waste is hazardous give HW ID Number:	F003, D022	D001, F002, F005
Amount generated per month:	55 gals	110 gals
Amount presently in storage:	One 55 gal drum	Four 55 gal drums
Accumulation time:	1/7/99	12/28/98
Present disposal methods:	ENSCO	ENSCO



Isopropyl Alcohol

Waste:	IPA/ Wastewater	Lab Park Waste
If waste is hazardous give HW ID Number:	D001	Varies
Amount generated per month:	600 gals	20 gals
Amount presently in storage:	Three 55 gal drums	none
Accumulation time:	1/14/99	—
Present disposal methods:	ENSCO	ENSCO

Waste:	Park Waste Solvent	Drum Rinse
If waste is hazardous give HW ID Number:	D008, 18, 39 & 40	Non-Haz
Amount generated per month:	8 gals	55 gals
Amount presently in storage:	none	none
Accumulation time:	3 weeks	—
Present disposal methods:	Safety-Kleen	Varies

Waste:	Used Oil	Fluorescent Bulbs
If waste is hazardous give HW ID Number:	non-haz	non-haz
Amount generated per month:	55 gals	Varies
Amount presently in storage:	< 110 gals	< 90 bulbs
Accumulation time:	> 4 mos	unknown
Present disposal methods:	Safety-Kleen	returned to supplier

Waste:	Non-PCRA Solid Waste	Non-PCRA Pharmaceutical liquid Waste
If waste is hazardous give HW ID Number:	non-haz	non-haz
Amount generated per month:	1,500 gals	110 gals
Amount presently in storage:	unknown	unknown
Accumulation time:	—	—
Present disposal methods:	Ogden Martin Indianapolis	Ogden Martin Indianapolis

Waple's
Plastic liners
floor clean-up

Waste:	Pesticide Waste	Lab Pack
If waste is hazardous give HW ID Number:	DOO1 (Varies)	non-haz
Amount generated per month:	55 gals	varies
Amount presently in storage:	None	unknown
Accumulation time:	—	—
Present disposal methods:	ENSCO	Ogden Martin

Waste:	Cardboard	Ethylene Glycol
If waste is hazardous give HW ID Number:	non-haz	non-haz
Amount generated per month:	Varies	varies
Amount presently in storage:	unknown	2 55 gal drums
Accumulation time:	unknown	11/19/98
Present disposal methods:	Recycled - Deffenbaugh	ENSCO

Waste:	Regular Trash	Bio-Medical Waste
If waste is hazardous give HW ID Number:	non-haz	non-haz
Amount generated per month:	Varies	Fifteen 30 gal totes
Amount presently in storage:	< 20 y ³ compactor	< 3 totes
Accumulation time:	One month	unknown
Present disposal methods:	Deffenbaugh	BFI

Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal methods:		

General Requirements (GGR)

YES NO NA

1. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? [KAR 28-31-4(b)/40 CFR 261.2] ☒ YES ☐ NO ☐ NA
- a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? [KAR 28-31-4(b)(3)(A)] ☒ YES ☐ NO ☐ NA
- b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? [KAR 28-31-4(f)(1)(C)] ☒ YES ☐ NO ☐ NA
2. Is hazardous waste(s) disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW)? [KAR 28-31-3/40 CFR 261.4] ☐ YES ☒ NO ☐ NA
- a. If yes, does the facility discharge greater than 25 kilograms per month? ☐ YES ☐ NO ☐ NA
- b. If yes, has facility submitted the RCRA (Wastewater) Notification Form [40 CFR, Part 403.12(p)] to the following agencies:
- City - POTW? ☐ YES ☐ NO ☐ NA
- US EPA Region VII - Director of Waste Management? ☐ YES ☐ NO ☐ NA
- KDHE - Bureau of Waste Management? ☐ YES ☐ NO ☐ NA
- NOTE: RCRA (Wastewater) Notification forms are obtained from: Bureau of Water (785) 296-5551.
3. Does facility dispose of industrial waste that requires a Special Waste Disposal Authorization at a permitted sanitary landfill? ☐ YES ☒ NO ☐ NA
- a. If yes, list the authorization number(s): _____

General Requirements:☒ Compliance ☐ Non-Compliance ☐ NA**Notification of Requirements (GGR)**

4. Has facility notified KDHE and obtained an EPA Identification Number? [KAR 28-31-4(c)] ☒ YES ☐ NO ☐ NA
5. Is current notification accurate? [KAR 28-31-4(c)(1)] ☐ YES ☒ NO ☐ NA

Notification Requirements:☐ Compliance ☒ Non-Compliance ☐ NA

(small quantity generator not accumulating, stop here)

Violation #1
Facility Contact changed in May, 1998.

Pre-Transport Requirements (GPT)

YES NO NA

6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 requirements? [KAR 28-31-4(e)(1)] ☒ []
7. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of Subpart E of 49 CFR 172? [KAR 28-31-4(e)(2)] ☒ []
8. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 49 CFR 172 Subpart D? [KAR 28-31-4(e)(3)] ☒ []
- a. Does generator mark each container of 110 gallons or less as below? [KAR 28-31-4(e)(3)] ☒ []

Hazardous Waste-Federal Law Prohibits Improper Disposal.

If found, contact the nearest police or public safety authority or the US EPA.

*Generator's Name and Address
Manifest Document Number*

9. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? [KAR 28-31-4(e)(4)] *Bob Castle - Receiving Dock* ☒ []
10. Does generator only use a transporter who has notified the department and obtained an EPA Identification Number? [KAR 28-31-4(c)(2)] ☒ []

Pre-Transport Requirements:☒ Compliance [] Non-Compliance [] NA**Storage Requirements (GPT)**

11. Does generator temporarily store waste in containers before transport? ☒ []
- If yes,
- a. Are containers marked with the words "Hazardous Waste"? [KAR 28-31-4(g)(3) or (h)(1)(D)] ☒ []
- b. Is the accumulation start date marked on each container? [KAR 28-31-4(g)(2) or (h)(1)(C)] ☒ []
- c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? [KAR 28-31-4(g)(1) or (h)(1)(B)] ☒ []
- d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? [KAR 28-31-4(g)(1) or (h)(1)(B)] ☒ []
- A. If yes, are these inspections documented in a log that includes complete date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? [KAR 28-31-4(k)/40 CFR 265.15(d)] [] ☒

Violation
#2
(also QC Lab)

Storage Requirements:☐ Compliance [] Non-Compliance [] NA

(Small quantity generator accumulating <1,000 Kilograms stop here)

▲ Last documented inspection 5/15/98. Paul does inspection every Friday. Mark Arango also conducts inspections.

Storage Requirements for Kansas and EPA Generators (GPT)

YES NO NA

- e. Is hazardous waste stored for 90 days or less? ☒ YES ☐ NO ☐ NA
- f. Is $\geq 1,000$ kilograms of hazardous waste stored for more than 90 days? ☐ YES ☒ NO ☐ NA
- g. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) [KAR 28-31-4(g)(1)/40 CFR 265.176] ☒ YES ☐ NO ☐ NA
- h. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? [KAR 28-31-4(g)(1) or (h)(1)(B)/40 CFR 265.177] ☒ YES ☐ NO ☐ NA
- i. Does generator have any satellite storage areas? [KAR 28-31-4(j)] ☒ YES ☐ NO ☐ NA
- A. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? ☒ YES ☐ NO ☐ NA
- B. Is the container in good condition and closed except to add or remove waste? ☒ YES ☐ NO ☐ NA
- C. Is the container marked with the words "Hazardous Waste"? ☐ YES ☒ NO ☐ NA
- D. Is the container marked with the accumulation start date at the time it becomes full? ☐ YES ☒ NO ☐ NA
- E. Is the full container moved to the storage area within three days after it becomes full? ☐ YES ☒ NO ☐ NA

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

Storage Requirements:

☐ Compliance ☒ Non-Compliance ☐ NA

Manifests (GMR)

12. Is a contractual agreement used in place of manifesting? [KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2)] ☐ YES ☒ NO
- If yes,
- a. Does the contractual agreement include the type of waste and frequency of shipments? ☐ YES ☐ NO
- b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? ☐ YES ☐ NO
- c. Is a copy of the agreement kept for a period of three years after termination of agreement? ☐ YES ☐ NO ☐ NA
13. Is a current manifest showing revision date and burden disclosure statement used? [KAR 28-31-4(d)/40 CFR 262.20] ☒ YES ☐ NO
- a. If yes, does manifest(s) include:
- A. Generator EPA Identification Number (12 digit) and unique manifest document number (five digit)? ☒ YES ☐ NO
- B. Number of pages? ☒ YES ☐ NO
- C. Generator's name and mailing address? ☒ YES ☐ NO
- D. Generator's phone number? ☒ YES ☐ NO
- E. Transporter 1 Name? ☒ YES ☐ NO
- F. Transporter 1 EPA Identification Number? ☒ YES ☐ NO
- G. Transporter 2 Name? ☒ YES ☐ NO
- H. Transporter 2 EPA Identification Number? ☒ YES ☐ NO
- I. Name and site address of designated facility? ☒ YES ☐ NO
- J. Designated facility's EPA Identification Number? ☒ YES ☐ NO

Violation
#3
Violation #4
Sel
SUMMARY

YES NO NA

- K. Waste Description (DOT shipping name, hazard class, and Identification Number)? ☒ YES ☐ NO ☐ NA
- i. If applicable, are the requirements of 49 CFR 172.203(k) met? ☒ YES ☐ NO ☐ NA
- L. Number and type of containers? ☒ YES ☐ NO ☐ NA
- M. Total quantity? ☒ YES ☐ NO ☐ NA
- N. Unit (weight or volume)? ☒ YES ☐ NO ☐ NA
- O. Special handling instructions? ☒ YES ☐ NO ☐ NA
- P. Generator's certification including waste minimization statement, generator's signature and date? ☒ YES ☐ NO ☐ NA
- Q. Name, signature, and date of transporter 1? ☒ YES ☐ NO ☐ NA
- R. Name, signature, and date of transporter 2? ☒ YES ☐ NO ☐ NA
- b. Does generator retain a copy of manifest(s) signed by both generator and transporter? [KAR 28-31-4(d)(4)(A-C)/40 CFR 262.23] ☒ YES ☐ NO ☐ NA
- c. Does generator retain copy of manifest(s) signed and dated by T/S/D facility owner/operator for three years? [KAR 28-31-4(f)(1)(A)] ☒ YES ☐ NO ☐ NA
- d. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment? ☐ YES ☒ NO ☐ NA
- A. If yes, was exception report(s) filed? [KAR 28-31-4(f)(4)(B)] ☐ YES ☒ NO ☐ NA
- i. If yes, was copy retained for three years? [KAR 28-31-4(f)(1)(A)] ☐ YES ☐ NO ☐ NA

Manifesting Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Land Disposal Restriction Requirements (GLB)

14. Does facility generate waste(s) subject to the Land Disposal Restrictions? [KAR 28-31-14/40 CFR 268] ☒ YES ☐ NO ☐ NA
15. Does the generator dispose of his waste under a contractual or tolling agreement? [40 CFR 268.7(a)(10)] ☐ YES ☒ NO ☐ NA
- a. If yes, is a Land Disposal Restriction Notice available for the initial shipment? ☐ YES ☐ NO ☐ NA
- b. If yes, is a copy of this notice kept for three years after termination of the agreement? ☐ YES ☐ NO ☐ NA
16. Is the waste(s) covered by a National Variance(s), Extension, or Petition? [40 CFR 268.5 & 6] ☐ YES ☒ NO ☐ NA
- a. If yes, describe the variance, extension, or petition which applies:
- _____
- _____
17. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? [40 CFR 268.7(a)(1)] ☒ YES ☐ NO ☐ NA
- If yes,
- a. Does the generator provide a notice with each shipment? ☒ YES ☐ NO ☐ NA
- b. Does the notice include: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or nonwastewater classification, and subcategory, if applicable? ☒ YES ☐ NO ☐ NA
18. Has the generator determined that his waste meets applicable treatment standards or does not exceed prohibition levels and requires no further treatment? [40 CFR 268.7(a)(2)] ☐ YES ☒ NO ☐ NA

YES NO NA

- a. If yes, does the generator provide a notice and certification statement with each shipment, stating the waste meets applicable treatment standards or prohibition levels? [] []
19. Is the waste covered by an exemption? [40 CFR 268.7(a)(3)] [] ~~[]~~
- a. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? [] []
20. Does the generator accumulate and treat waste in tanks, containers, or containment buildings to meet applicable treatment standards? [40 CFR 268.7(a)(4)] [] ~~[]~~
- If yes,
- a. Does the generator have verification that a notice was submitted to KDHE at least 30 days prior to treatment activity? [] []
- b. Does the generator have, on-site, a written waste analysis plan describing procedures used to comply with the treatment standards? [] []
- c. Does the generator ship waste off-site? [] []
- A. If yes, does the generator provide a notice and certification statement with each shipment? [] []
21. Has the generator determined his waste to be restricted based solely on his knowledge of the waste?[40 CFR 268.7(a)(5)] [] ~~[]~~
- a. If yes, does the generator maintain all supporting data in his on-site files? [] []
22. Has the generator determined his waste to be restricted based on testing [40 CFR 268.7(a)(5)] [] ~~[]~~
- a. If yes, does the generator maintain a copy of these waste analysis in his on-site files? [] []
23. Is the waste excluded from the definition of hazardous or solid waste, or is exempt from Subtitle C regulations? (40 CFR 268.7(a)(6)) [] ~~[]~~
- a. If yes, does the generator retain, in their file, a one-time notice of the generation and subsequent exclusion from the definition of hazardous or solid waste, and information regarding the disposition of the waste? [] []
24. Does the generator retain copies of all notices, certifications, demonstrations waste analysis data, and other documents for at least 3 years? [40 CFR 268.7(a)(7)] ~~[]~~ [] []
25. Does the generator claim that the hazardous debris is excluded from the definition of hazardous waste under 40 CFR 261.3(f)(1) or (2)? [40 CFR 268.7(d)] [] ~~[]~~
- a. If yes, does the generator provide a one-time notice and certification to the State of Kansas and retain a copy in his files? [] []
26. Is the generator managing a lab pack waste(s)? [40 CFR 268.7(a)(8)] ~~[]~~ []
- If yes,
- a. Does the generator wish to use an alternative treatment standard? [] ~~[]~~
- b. Does the generator provide a notice and certification with each shipment? ~~[]~~ []
27. Does generator claim that their characteristic waste is no longer hazardous? [40 CFR 268.9(d)] [] ~~[]~~
- If yes,

YES NO NA

- a. Has the generator submitted a one-time notice and certification to the State of Kansas and retained a copy for their files? ☐ ☒ ☐
- b. Does the information on the notice and certification need to be updated? ☐ ☐ ☐

LDR Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Special Conditions (GSC)

28. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F) ☐ ☒
- If yes,
- a. Has generator filed a notice with the Secretary of the KDHE? ☐ ☐
- b. Is waste manifested and signed by a foreign consignee? ☐ ☐
- c. If generator transports waste out of the country, has confirmation of delivered shipment been received? ☐ ☐ ☐

Special Conditions Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Kansas Generator's Emergency Preparedness (GPT)

29. Has facility named one employee as emergency coordinator? [KAR 28-31-4(h)(1)(E)] ☐ ☐
- a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? ☐ ☐
- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? ☐ ☐
- c. Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? ☐ ☐
30. Is the following information posted next to at least one telephone which is immediately accessible in an emergency? [KAR 28-31-4(h)(1)(F)]
- a. Name and telephone number of the emergency coordinator(s)? ☐ ☐
- b. Location of fire extinguishers, fire alarms, or spill control material, if available? ☐ ☐
- c. Telephone number of fire department unless facility has a direct alarm? ☐ ☐
31. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? [KAR 28-31-4(h)(1)(G)] ☐ ☐
- a. Is this training documented in any way? ☐ ☐

KS Gen.'s Emergency Preparedness Requirements:

☐ Compliance ☐ Non-Compliance ☒ NA

(If Kansas generator, stop here)

Biennial Reports (GRR)

YES NO NA

32. Has EPA generator submitted a biennial report(s) to KDHE? [KAR 28-31-4(f)(2)] ☒ []
- a. If yes, does the biennial report include a written description of the generator's waste minimization program? [KAR 28-31-4(f)/40 CFR 262.41(a)] [] [] []
- A. If yes, does the description include:
- i. Efforts undertaken during the year to reduce the volume and toxicity of waste generated? [KAR 28-31-4(f)/40 CFR 262.41(a)(6)] [] []
- ii. Changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [KAR 28-31-4(f)/40 CFR 262.41(a)(7)] [] []
- iii. Certification by the generator or authorized representative? [KAR 28-31-4(f)/40 CFR 262.41(a)(8)] [] []
- b. If no, can the facility personnel provide a verbal description of the waste minimization program? [] [] []
- Description of Program:
- _____
- c. Is there any visual evidence of the facility's waste minimization efforts? [] []
If yes, describe the activities/program observed.

- d. Does generator retain a copy of the report for three years? [] []
[KAR 28-31-4(f)(1)(B)]

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:☒ Compliance [] Non-Compliance [] NA**Preparedness and Prevention (GPT)**

33. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? [KAR 28-31-4(g)(4)/40 CFR 265.32(a)] ☒ []
- b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? [KAR 28-31-4(g)(4)/40 CFR 265.32(b)] ☒ [] []
- c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? [KAR 28-31-4(g)(4)/40 CFR 265.32(c)] ☒ []
- d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? [KAR 28-31-4(g)(4)/40 CFR 265.32(d)] ☒ []
- e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? [KAR 28-31-4(g)(4)/40 CFR 265.33] ☒ []
34. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [KAR 28-31-4(g)(4)/40 CFR 265.35] ☒ []
35. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

YES NO NA

- a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)] ☒ YES ☐ NO ☐ NA
- b. Designated one authority where one or more police or fire departments might respond to an emergency? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)] ☐ YES ☐ NO ☒ NA
- c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)] ☒ YES ☐ NO ☐ NA
- d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)] ☒ YES ☐ NO ☐ NA
36. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [KAR 28-31-4(g)(4)/40 CFR 265.37(b)] ☐ YES ☐ NO ☒ NA

Preparedness and Prevention Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Personnel Training (GPT)

37. Has the owner/operator established a hazardous waste management training program? [KAR 28-31-4(g)(4)/40 CFR 265.16] ☒ YES ☐ NO
- a. Is the program directed by a person trained in hazardous waste management? [40 CFR 265.16(a)(2)] ☒ YES ☐ NO
- b. Are new personnel trained within six months after their employment? [40 CFR 265.16(b)] ☒ YES ☐ NO
- c. Are new employees supervised until training is completed? [40 CFR 265.16(b)] ☒ YES ☐ NO
- d. After initial training, are employees trained on an annual basis? [40 CFR 265.16(c)] ☒ YES ☐ NO
- e. Does the facility maintain the following documents and records:
- A. Job title for each position related to hazardous waste management and the name of the employee filling each job? [40 CFR 265.16(d)(1)] ☒ YES ☐ NO
- B. Written job description for each position? [40 CFR 265.16(d)(2)] ☒ YES ☐ NO
- C. Description of type and amount of training to be given each person? [40 CFR 265.16(d)(3)] ☒ YES ☐ NO
- D. Records of training given to facility personnel? [40 CFR 265.16(d)(4)] ☒ YES ☐ NO

Personnel Training Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Contingency Plan (GPT)

38. Does the facility have a contingency plan? [KAR 28-31-4(g)(4)/40 CFR 265 Subpart D] ☒ YES ☐ NO
- If yes,
- a. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? [40 CFR 265.52(d)] ☒ YES ☐ NO
- b. Is an emergency coordinator available at all times? [40 CFR 265.55] ☒ YES ☐ NO
- c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? ☒ YES ☐ NO

last
updated
9/19/97

YES NO NA

- d. Does the plan describe arrangements made with emergency response agencies? [40 CFR 265.52(c)] ~~[X]~~ []
- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? [40 CFR 265.52(e)] ~~[X]~~ []
- f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? [40 CFR 265.52(f)] ~~[X]~~ []
- g. Have copies of the plan been provided to outside emergency response agencies and hospitals? [40 CFR 265.53] ~~[X]~~ []
- h. Has implementation of the plan been required at the facility? [] ~~[X]~~
- A. If yes, was the facility required to submit a written report on the incident to the KDHE? [] []
- i. If yes, was the written report submitted? [40 CFR 265.56(j)] [] [] []

Contingency Plan Requirements:

~~[X]~~

[] Compliance

[] Non-Compliance

[] NA

(if EPA generator, stop here.)

**February 4, 1999 Inspection Summary
Boehringer Ingelheim Animal Health, Inc.
15th and Oak
Elwood, KS
KSD 067 925 347**

Inspection Conducted by M. Beth Rowlands

A routine inspection was conducted at Boehringer Ingelheim Animal Health, Inc. Elwood Production Facility (BIAHI-Elwood) to determine compliance with state hazardous waste regulations. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. I was accompanied throughout the inspection by Paul Waters, the facility's Environmental Quality Manager, for the past four months. This facility was last inspected as an EPA Generator of hazardous waste on July 22, 1993.

GENERAL

The Boehringer Ingelheim Animal Health, Inc. - Elwood Production Facility has been manufacturing pharmaceuticals and pesticide products for veterinary use at this location since 1989. The Pharmaceutical Building, located at 1411 Oak Street, directly north and east of the intersection of 15th & Oak Street, is involved primarily in the formulation of veterinary drug products. The Specialty Products Building, located at 502 15th Street, immediately west and south of the intersection of 15th & Oak, is involved primarily in the formulation and production of pesticide products. The Specialty Products Building is also the main warehousing facility for raw materials used in both buildings. The Waste Accumulation Building, located immediately south and west of the Specialty Products Building is used to store hazardous waste and flammable raw materials. The facility employs approximately 200 people working two shifts, five days per week.

Specialty Products Building

In addition to three product lines this building houses the maintenance shops, main warehouse and non-hazardous waste storage. Wastes generated in the Specialty Products Building include process wastewater, rejected finished products, rejected raw materials, labpack wastes, parts washer solvent and used oil.

Pharmaceutical Building

QC Lab

One gallon satellite accumulation containers are located at each process area. Contents of these containers are deposited daily into either a chlorinated or non-chlorinated solvent drum located in the northeast corner of the lab. The chlorinated solvent drum may include: chloroform, carbon tet, methylene chloride, butyl chloride, and other chlorinated solvents. The non-chlorinated

solvent drum may include: methanol, acetonitrile, acetone, isopropanol, ethanol, toluene, ethyl acetate, hexane, THF, dimethyl formamide, iodobromide, bromine-bromide solution, copper sulfate, monoethanolamine, *Nemacide* Oral & Surgical Solutions, and other non-chlorinated solvents.

Non-Hazardous wastes are collected in a 55-gallon drum labeled "Solid Toxic Waste Drum". This drum may contain: cattle ear tags, filtered *CSP & Denegard*, dog & cat collars, *Rabon*, *DDVP* products (*Atgard*, *Task*, *Equigard*, etc.), *Nemacide* tablets/ capsules/packets, pipettes/gloves/glassware.

A storage cabinet located along the east wall of the QC Lab contains various containers of product and lab waste. At the time of the inspection, one shelf was designated for storage of hazardous waste including two 1-gallon containers of lead waste; one 1-gallon container of arsenic and numerous smaller containers with various unwanted or out-of-date products. An inventory log is located near this shelving unit to document what wastes are placed on the shelves and when. (See attached inventory log.) Mr. Waters indicated that the cabinet is cleaned out before every shipment of hazardous waste and the small containers are lab packed prior to shipment. Mr. Waters was instructed to label each container with the words "Hazardous Waste" and mark each container with the accumulation start date.

DDVP Formulation Area

The DDVP formulation area is located in the northeast corner of the building. Two 55-gallon satellite containers for liquid and solid hazardous waste generated in the DDVP formulation washdown area are located here. DDVP is the active ingredient in Anthelmintic and *Atgard* products. One drum contains liquid waste and one drum contains solid waste. An inventory log located near the drums indicated that these drums have been accumulating waste since 1996. At the time of the inspection, the drum containing solid waste was not labeled with the words, "Hazardous Waste".

Water Treatment Area

All wastewater in the Pharmaceutical Building and the Specialty Products Building is treated on-site prior to being discharged to the sanitary sewer. The treatment system consists of one 10,000 gallon collection tank, two 10,000 gallon treatment tanks, a small holding tank and a release tank. The water is treated with electrolysis and heated to 140° F for eight hours. This breaks down the active ingredients such as DDVP. The water is then treated with a liquid caustic soda solution to adjust the pH. The tanks have not been cleaned since 1991 and Safety-Kleen and Heritage are currently bidding to remove the sludge from the tanks. Water used as an ingredient in products is further purified before use to injection grade quality.

VIOLATIONS

- 1) **Failure to update facility contact on Notification of Regulated Waste Activity form in violation of K.A.R. 28-31-4(c)(1).** The most current subsequent notification form received in March, 1997, listed Kent Hart as the facility contact. Mr. Waters stated that Mr. Hart has ceased employment with this facility in May, 1998. Mr. Waters replaced Mr. Kent approximately four months ago.
- 2) **Failure to document weekly inspections of hazardous waste storage areas in violation of K.A.R. 28-31-4(h)(1)(B).** Mr. Waters could not produce documented weekly inspections of the hazardous waste storage area after May 15, 1998, for review during the inspection. Mr. Waters stated that since his employment, he has inspected the storage area every Friday. Mr. Waters believes that prior to his employment, the weekly inspections were conducted by Mark Areono. Mr. Areono was not available during my inspection.
- 3) **Failure to mark satellite containers with the words "Hazardous Waste" in violation of K.A.R. 28-31-4(j).** Approximately thirty containers of various waste types and sizes were located on a shelving unit in the QC Lab of the Pharmaceutical Building. None of these containers were labeled with the words "Hazardous Waste". Mr. Waters explained that the lab wastes are logged on the inventory sheet prior to placement on the shelf. Prior to each hazardous waste shipment, the contents of the shelf are lab packed in a 55-gallon drum, marked with the accumulation start date and moved to the hazardous waste storage area located southwest of the Specialty Products Building. In addition, one 55-gallon drum containing solid waste from the DDVP formulation washdown area was not labeled with the words "Hazardous Waste".
- 4) **Failure to mark accumulation start date on full satellite containers in violation of K.A.R. 28-31-4(j).** None of the approximately thirty containers located on the shelving unit in the QC Lab were marked with the accumulation start date. (See violation #3).

COMMENTS

During the exit interview, Mr. Waters was given the following documents:

Generator Handbook
Hazardous Waste Regulations
Notification of Regulated Waste Activity form
Generator Checklist (blank)

Weekly Inspection Log example
Hazardous Waste Connection newsletter
Appropriate Guidance Documents
NONC (sent on 2/5/99)

ATTACHMENTS

HWC MEL - 1 page

NONC - 1 page

Generator Checklist - 12 pages

Used Oil Checklist - 3 pages

Facility Diagram - 2 pages

Lab Pack Inventory - 1 page

Photographs - 2 pages



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
FORBES FIELD, TOPEKA, KANSAS 66620



USED OIL
COMPLIANCE INSPECTION CHECKLIST

General

☒ Routine ☐ Complaint

EPA ID KSD 067 925 347 Time 10:30 Date 2/4/99

Facility Name BOEHRINGER INGELHEIM ANIMAL HEALTH District NORTHEAST

Street 15TH + OAK City ELYWOOD Kansas ZIP 66024

Mailing Address (if different than above) P.O. Box 338

County DONIPHAN Phone (913) 365-9070

Contact(s) PAUL WATERS, ENVIRONMENTAL QUALITY MGR.

Inspector(s) M. BETH ROWLANDS

Type of Business VETERINARY PRODUCTS PRODUCTION Number Employees 200 ±

Has the company declared any information/processes as trade secrets (KSA 65-3447)? NO
If yes, explain: _____

TYPE OF STORAGE CONTAINERS:

☒ Drums ☐ Tanks ☐ Other: _____

FACILITY TYPE:

☒ Generator

☐ Transporter / Transfer Facility

☐ Used Oil Burner (Off-Spec Fuel)

☐ Collection center / Aggregation point

☐ Used Oil Processor / Re-Refiner

☐ Used Oil Marketer

	Off-Spec Used Oil	On-Spec Used Oil	Oil Filters
Types of Oils (i.e., motor oil, cooling oil, cutting oil, compressor oil)	<u>MOTOR OIL</u>		
Amount generated per month:	<u>VARIES</u>		
Amount received from off-site sources:	<u>NONE</u>		
Amount presently in storage:	<u>< 10 gals</u>		
Accumulation time:			
Present disposal methods:			

SUBPART C: STANDARDS FOR USED OIL GENERATORS

	YES	NO	N/A
1. Does facility mix hazardous waste with used oil? [40 CFR, 279.21] If yes,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a. Does facility manage mixture as a hazardous waste? [K.A.R. 28-31-4(p)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
A. If no, does the facility fall under the SQG exemption?	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does facility store used oil on-site? [40 CFR, 279.22], If yes,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a. Is the storage unit(s) in good condition? [40 CFR, 279.22(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Is the storage unit(s) free from leaks? [40 CFR, 279.22(b)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Is the storage unit(s) and/or fill pipe(s) labeled with the words "USED OIL?" [40 CFR 279.22(c)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has there been a release of Used Oil? [40 CFR 279.22(d)] If yes,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a. Was the leak stopped? [40 CFR 279.22(d)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Was the release contained? [40 CFR 279.22(d)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
c. Was the release cleaned-up and managed properly? [40 CFR 279.22(d)(3)]	<input type="checkbox"/>	<input type="checkbox"/>	
d. If necessary, was the storage unit repaired or replaced? [40 CFR 279.22(d)(4)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Does facility burn used oil on-site? [40 CFR 279.23] If yes,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a. Does facility burn only used oil that the generator/operator generates or used oil received from household do-it-yourself used oil generators? [40 CFR 279.23(a)]	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is the space heater designed to have a maximum capacity of not more than 0.5 million Btu per hour? [40 CFR 279.23(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
c. Is the combustion gases from the space heater vented to the ambient air? [40 CFR, 279.23(c)]	<input type="checkbox"/>	<input type="checkbox"/>	
5. Does generator self-transport used oil to an approved collection site? [40 CFR 279.24(a)] If yes,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [40 CFR 279.24(a)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	

YES NO N/A

- b. Does the generator transport no more than 55 gallons of used oil at any time? [40 CFR 279.24(a)(2)]

☐ ☐

NOTE: IF NO TO QUESTION 5-a OR 5-b, COMPLETE TRANSPORTER CHECKLIST.

- c. Does the generator transport used oil to a used oil collection center that is registered, licensed, permitted or recognized by the state to handle used oil? [40 CFR 279.24(a)(3)]

☐ ☐

6. Does the generator self-transport used oil to an aggregate collection site owned by the generator? [40 CFR 279.24(b)]
If yes,

☐ ☒ ☐

- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [40 CFR 279.24(b)(1)]

☐ ☐

- b. Does the generator transport no more than 55 gallons of used oil at any time? [40 CFR 279.24(b)(2)]

☐ ☐

- c. Does the generator transport used oil to a used oil collection center that is registered, licensed, permitted or recognized by the state to handle used oil? [40 CFR 279.24(b)(3)]

☐ ☐

NOTE: IF TRANSPORTING MORE THAN 55 GALLONS PER TRIP, COMPLETE THE TRANSPORTER/TRANSFER STATION CHECKLIST

7. Does the generator have their used oil reclaimed under a tolling (contractual) agreement? [40 CFR 279.24(c)]
If yes,

☒ ☐

- a. Does the tolling (contractual) agreement indicate the type of used oil and the frequency of shipments? [40 CFR, 279.24(c)(1)]

☒ ☐

- b. Is the vehicle used to transport the used oil to the processing/re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor/re-refiner? [40 CFR, 279.24(c)(2)]

☒ ☐

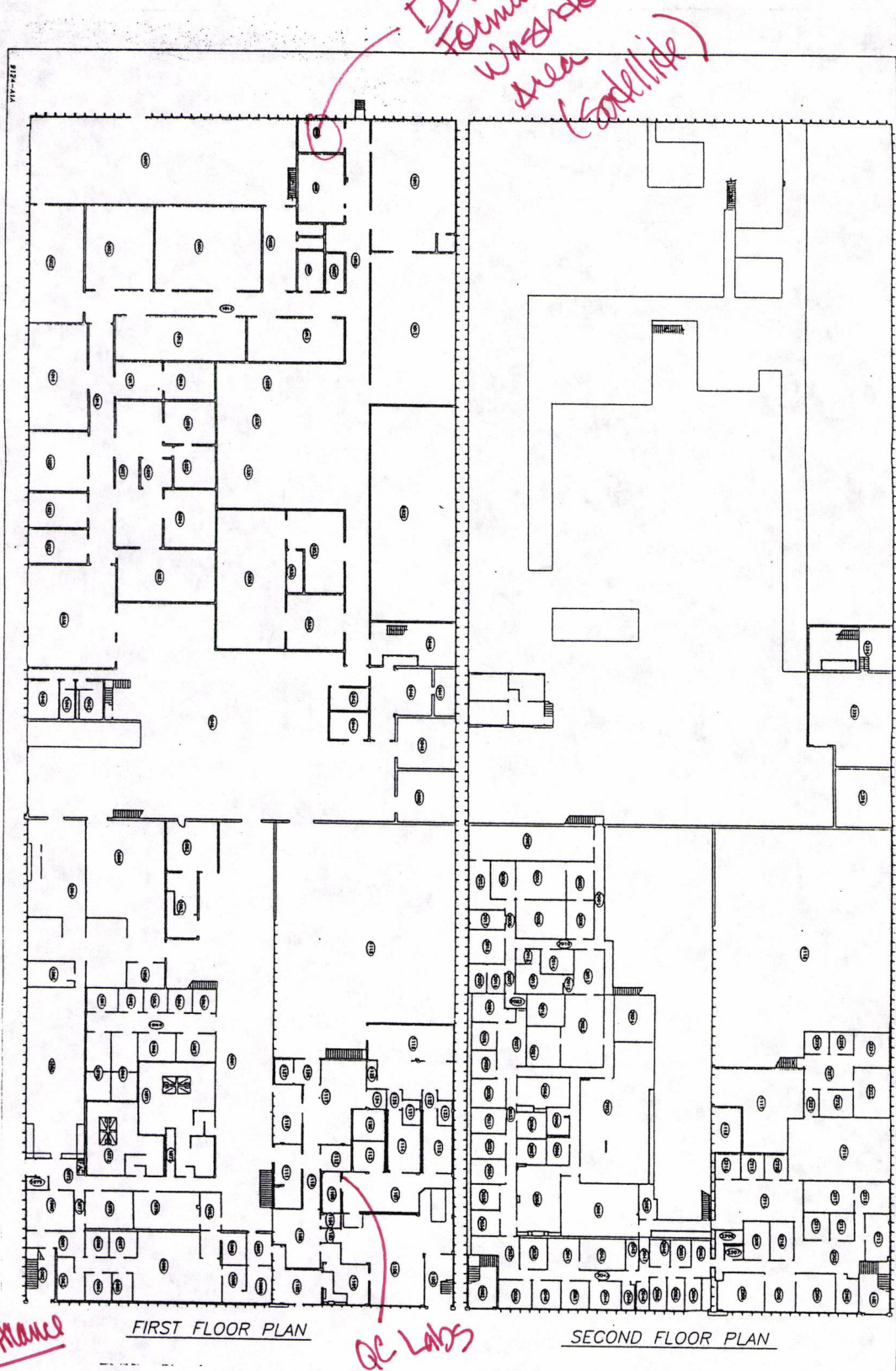
- c. Is reclaimed oil returned to the generator? [40 CFR, 279.24(c)(3)]

☐ ☒

Used Oil Generator Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

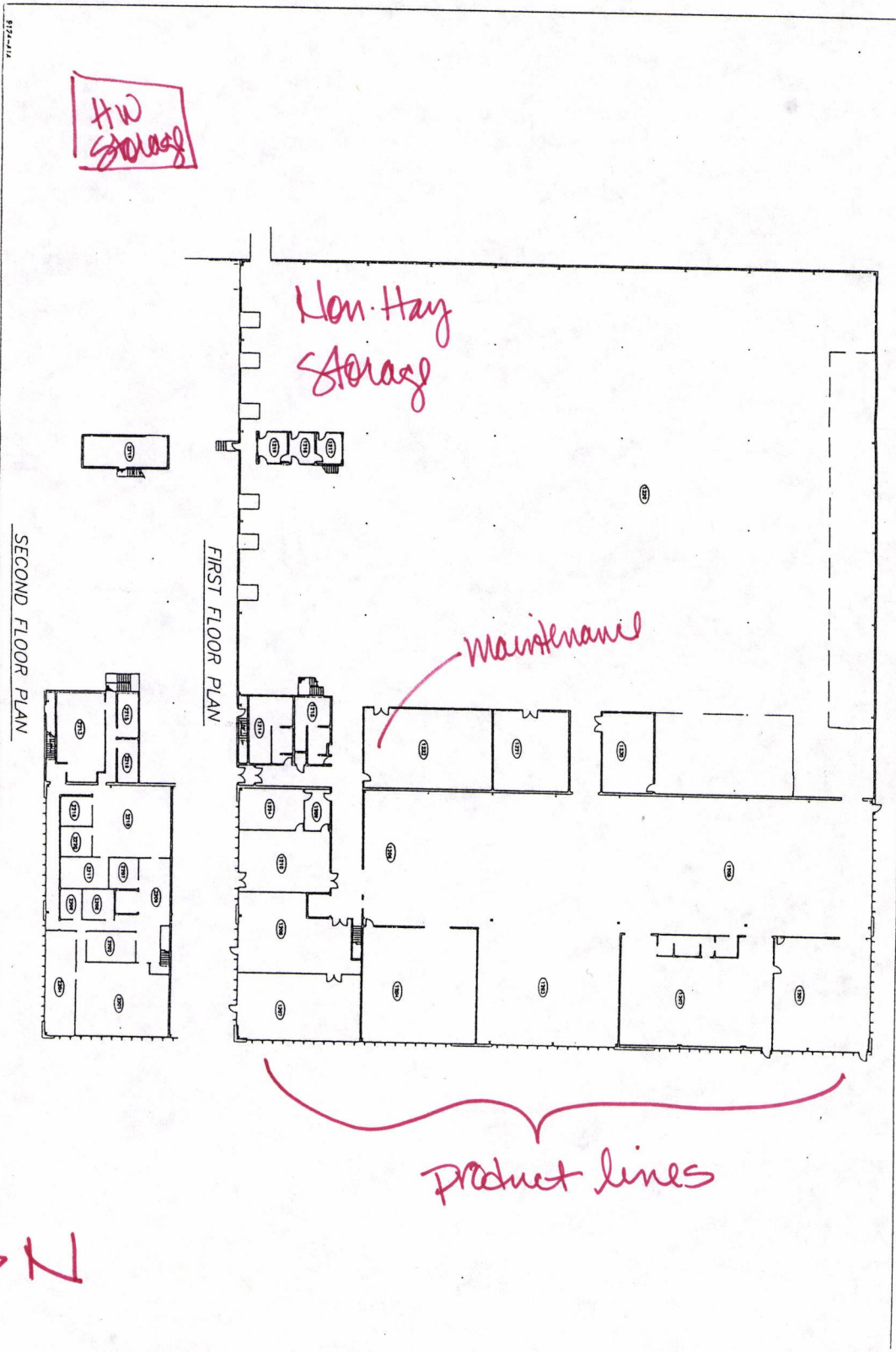
QC Lab
Satellite
Containers

QC Lab
Satellite
Containers



PHARMACEUTICAL PRODUCTION BUILDING

**BOEHRINGER INGELHEIM ANIMAL HEALTH, INC.
ELWOOD, KANSAS**



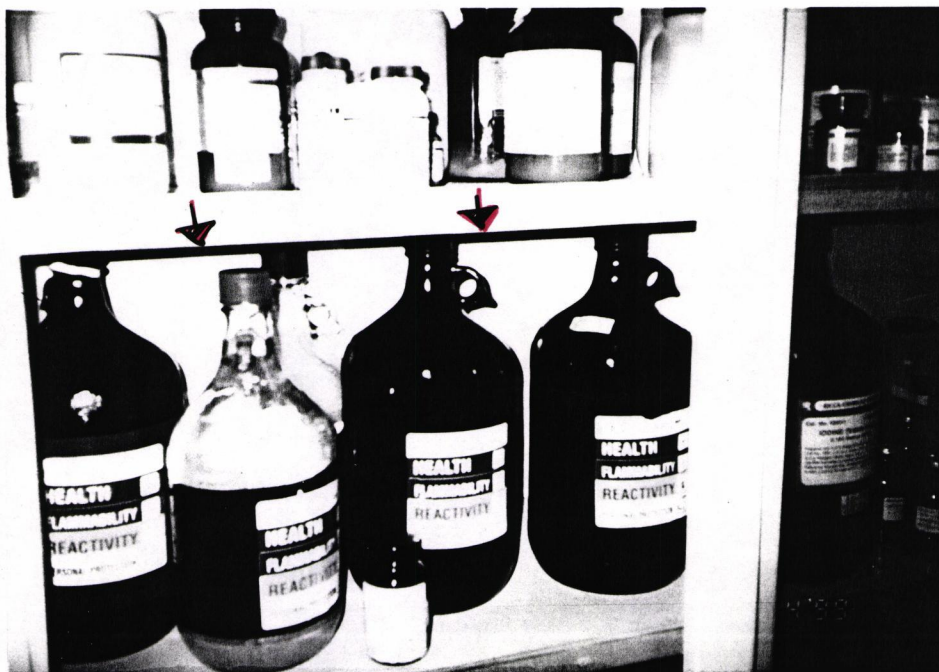
SPECIALTY PRODUCTS BUILDING

**BOEHRINGER INGELHEIM ANIMAL HEALTH, INC.
ELWOOD, KANSAS**

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Photo Mounting Sheet

Name of Site: BOEHRINGER INGELHEIM ANIMAL HEALTH

Location: ELWOOD DONIPHAN KED 067 925 347
(City) (County) (Legal)



Picture No. 1
Date: 020499
Facing: EAST
Weather: —
Comments: LAB WASTE
ON SHELF
IN QC LAB
INCLUDED
ARSENIC AND
LEAD WASTE
IN GALLON
JUGS.

NOT LABELED
"HAZARDOUS
WASTE" AND
NO ACCUMULATION
START DATE.



Picture No. 2
Date: 020499
Facing: EAST
Weather: —
Comments: 30 ± CONTAINER
OF LAB WASTE
IN QC LAB.

HAZARDOUS AND
NON-HAZARDOUS
WASTES MIXED

NOT LABELED
OR DATED.

WILL BE
LAB PACKED
WITH NEXT
HAZARDOUS
WASTE
SHIPMENT.

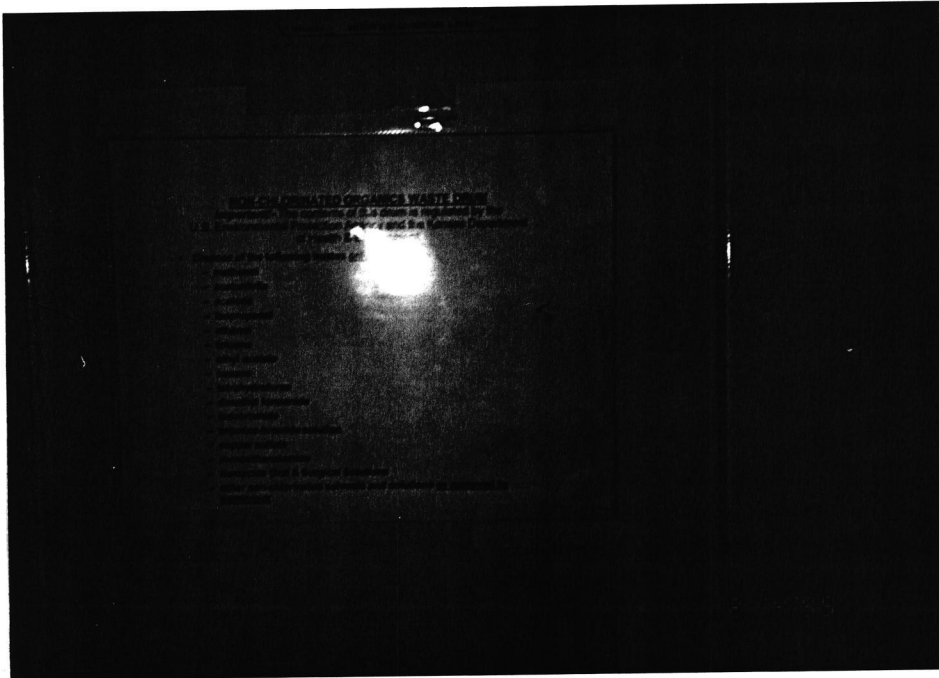
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Photo Mounting Sheet

Name of Site: BOEHRINGER INGELHEIM ANIMAL HEALTH

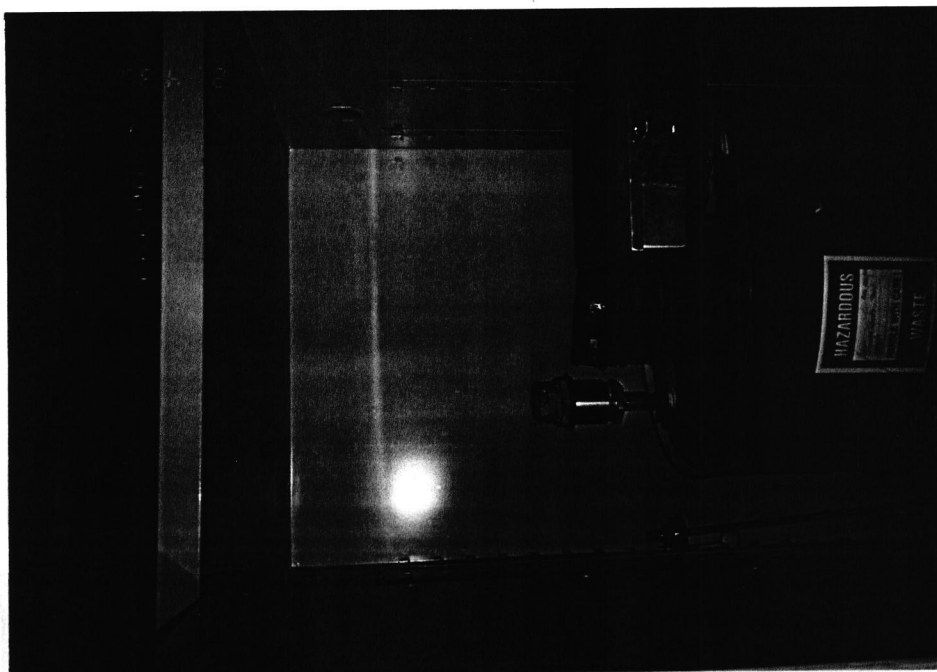
Location: ELWOOD
(City)

DONIPHAN
(County)

KED 067 925 3A7
(Legal)



Picture No. 3
Date: 020499
Facing: EAST
Weather: —
Comments:
SHOWING
LABEL ON
FLAMMABLE
STORAGE
CABINET
HOLDING A
55-GALLON
DRUM OF
"NON-CHLORINATED"
LAB WASTE
IN THE
QC LAB.



Picture No. 4
Date: 020499
Facing: EAST
Weather: —
Comments:
SHOWING
FUNNEL AND
VENT ON
55-GALLON
SATELLITE
CONTAINER
WITH
CHLORINATED
WASTE FROM
THE QC LAB



NOTICE OF COMPLIANCE/NON-COMPLIANCE

Page 1 of 1

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

Hazardous Waste: Complaint() LDF() TSF() GEN() ☒ KG() SQ() TRA() UOM() UOB() NOT A GEN()
Solid Waste: Complaint() SLF() TRF() ILF() CDL() HHW() OBS() UOS() WTT() WTP() WTM() YWC() MED()

TO: BOEHRINGER INGELHEIM ANIMAL HEALTH 02/04/99
Facility Name Date

15TH + Oak ELWOOD
Address City

KS 66024
State Zip Code

KSD067925347

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

- | | Citation |
|----|-----------------------------|
| 1) | <u>KAR 28.31.4(c)(1)</u> |
| 2) | <u>KAR 28.31.4(h)(1)(B)</u> |
| 3) | <u>KAR 28.31.4(j)</u> |
| 4) | <u>KAR 28.31.4(j)</u> |
| | |
| | |

Description of Violation
<u>Failure to update facility contact on</u>
<u>notification form.</u>
<u>Failure to document weekly inspections of</u>
<u>hazardous waste storage areas.</u>
<u>Failure to mark satellite containers</u>
<u>with the words "Hazardous Waste"</u>
<u>Failure to mark accumulation start</u>
<u>date on satellite containers when full.</u>

☐ Other Comments/Concerns:

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken ~~and/or a schedule for completion of necessary corrective actions to be taken.~~ Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

due by March 4, 1999

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (913) 842-4600 or Bureau of Waste Management in the Topeka Office at (913) 296-1604.

This Notice was prepared by

MB Rowlands

Date 02/04/99

Your response must be submitted to:

M. BETH ROWLANDS
Kansas Department of Health and Environment
Bureau of District Operation
Waste Management Programs
800 West 24th Street
Lawrence, Kansas ~~62046~~ 66046

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Not present

Signature: When completed.

Title:

Date: / /

MAR 15 1999

Hazardous Waste Compliance
Monitoring and Enforcement LogFORM
A

Handler

ID Number: **K S D 0 6 7 9 2 5 3 4 7** LDF () TSF () GEN (X) KG () SQ () TRA ()
HWM () HWB () UOM () UOB () NOT A GEN ()
Handler Name: **Boehringer Ingelheim Animal Health** AT **N/A** CL **4-2-99**
FT **4-2-99** RCRIS **4-6-99**

Street: **15th & Oak**City: **Elwood**County: **Doniphan**

EVALUATION

New ☒

Followup: Date (on site)

Date (of letter)

Delete ☐

Date **9 9** **0 2** **0 4** Agency **S** Type **C E I** Reason **0 0** Person **M B R** District **N E**

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other					
GER	N A	GPT	E V	DCH		DGW		DMC		DPP		BRR	
GGR	E V	GRR	E V	DCL		DIN		DMR		DSI		CAS	
GLB	E V	GSC	E V	DCP		DLB		DOR		DTR		CSS	
GMR	E V	GSQ	N A	DFR		DLF		DOT		DTT		FEA	
GOR	N A			DGS		DLT		DPB		DWP		ILD	
		TGR											
		TMR											
		TOR											
		TRR											
		TWD											

Used Oil UOM ☐ UOB ☐ UTM ☐ SUM ☐ SUB ☐

COMMENTS

VIOLATION # **1** Date Determined **0 2** **0 4** **9 9**New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **7** Area **G G R** Class **2** Priority ☐ Type **S R**

Regulation Citation: **K.A.R. 28-31-4(c)(1)**Description: **Failure to update notification form.** Returned to Compliance

Sch'd **0 3** **0 4** **9 9**
Actual ☐ ☐ ☐

VIOLATION # **2** Date Determined **0 2** **0 4** **9 9**New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **9** Area **G P T** Class **2** Priority ☐ Type **S R**

Regulation Citation: **K.A.R. 28-31-4(k)**Description: **Failure to document weekly inspections.** Returned to Compliance

Sch'd **0 3** **0 4** **9 9**
Actual ☐ ☐ ☐

VIOLATION # **3** Date Determined **0 2** **0 4** **9 9**New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **10** Area **G P T** Class **2** Priority ☐ Type **S R**

Regulation Citation: **K.A.R. 28-31-4(j)**Description: **Failure to mark satellite containers with the words** Returned to Compliance

Hazardous Waste" Sch'd **0 3** **0 4** **9 9**
Actual ☐ ☐ ☐

VIOLATION # **4** Date Determined **0 2** **0 4** **9 9**New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **11** Area **G P T** Class **2** Priority ☐ Type **S R**

Regulation Citation: **K.A.R. 28-31-4(j)**Description: **Failure to mark satellite containers with the** Returned to Compliance

accumulation start date. Sch'd **0 3** **0 4** **9 9**
Actual ☐ ☐ ☐

Hazardous Waste Compliance Monitoring and Enforcement Log

**FORM
B**

ID Number: **K S D 0 6 7 7 9 5 3 4 7**

Handler Name: **Boehringer Ingelheim Animal Health**

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

S

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

--	--

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

--

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

--	--

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

S

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

--	--

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

S

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

S	R
---	---

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

S

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

S	R
---	---

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

VIOLATION # _____ **Date Determined**

M	M
D	D
Y	Y

New ☐ Change ☐ Delete ☒ Comments ☐

Agency

S

 Number

--	--	--	--

 Area

--	--	--

 Class

--

 Priority

--

 Type

S	R
---	---

Regulation Citation: _____

Description: _____ Returned to Compliance _____

Schl'd

M	M
D	D
Y	Y

 Actual

--	--

ENFORCEMENT

New ☒ Change ☐ Delete ☒

Date

Y	Y
9	9

M	M
0	2

D	D
0	4

Number

--	--	--	--

Agency

S

 Type

1	2	0
---	---	---

District

N	E
---	---

Person

M	B	R
---	---	---

COVERED VIOLATIONS

Agency	Violation Number	Area
S	1	G G R
S	2	G P T
S	3	G P T
S	4	G P T

Agency	Violation Number	Area
S		
S		
S		
S		

Agency	Violation Number	Area
S		
S		
S		
S		

Comments: _____